

NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

FILED

MAR 27 2025

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
TOLEDO

BRIAN KEITH ALFORD,
PLAINTIFF,

CASE NO. 3:21-CV-01123

v.

JUDGE JAMES G. CARR

ROBERT ZILLES, et al,
DEFENDANTS.

MAGISTRATE JUDGE
DARRELL A. CLAY

MOTION FOR 60 DAY
EXTENSION TO FILE
MOTION IN OPPOSITION
TO SUMMARY JUDGMENT

COMES NOW PLAINTIFF BRIAN KEITH ALFORD,

PRO SE, AND RESPECTFULLY REQUEST

THE COURT GRANT A 60 DAY EXTENSION

TO FILE HIS MOTION IN OPPOSITION TO

DEFENDANT'S MOTION FOR SUMMARY

JUDGMENT (DOC. 62) FILED ON MARCH

12TH, 2025 AND RECEIVED BY PLAINTIFF

ON MARCH 18TH, 2025. A MEMORANDUM
IN SUPPORT IS ATTACHED IN SUPPORT OF
THIS REQUEST.

MEMORANDUM IN SUPPORT
PLAINTIFF REQUEST AN ADDITIONAL
60 DAYS TO PERFECT HIS MOTION IN
OPPOSITION TO SUMMARY JUDGMENT
DUE TO SEVERAL KEY FACTORS. DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT CONTAINS
A HIGH VOLUME OF EXHIBITS, WHICH
REQUIRES A LENGTHY, IN-DEPTH REVIEW
BY PLAINTIFF. PLAINTIFF IS HOUSED AT
A FACILITY WITH VERY LIMITED MOVEMENT,
(2)

FURTHER COMPLICATED BY THE DEATH
OF AN EMPLOYED CORRECTIONAL OFFICER
ON DECEMBER 25TH, 2024, AND
PLAINTIFF'S SEVERE ILLNESS REQUIRING
TRANSFER TO OHIO STATE UNIVERSITY
ON DECEMBER 23RD, 2024 TO JANUARY
2ND, 2025. PLAINTIFF WAS THEN HOUSED
IN INMATE HEALTH SERVICES FROM DECEMBER
27TH, 2024 UNTIL JANUARY 2ND, 2025
WITHOUT ACCESS TO LAW LIBRARY OR
HIS CASE FILE. IN ADDITION, THE
LAW LIBRARY IS WITH A LIBRARIAN
OR STAFF TO PRINT TYPED MATERIAL.
(3)

UNTIL RECENTLY, WITH PASSES ISSUED
BUT NO STAFF TO OPEN THE LAW
LIBRARY, LASTLY, PLAINTIFF'S HEALTH
CRISIS IS ONGOING AS HE HAS HAD A
CATHETER IN PLACE TO RELIEVE HIMSELF
SINCE DECEMBER 23, 2024 AND IS
AWAITING A ROUNDTRIP TO OHIO STATE
IN THE NEXT WEEK TO HAVE AN ENDOSCOPE
INSERTED TO DETERMINE A DIAGNOSIS FOR
HIS AILMENT. THEREFORE, THE EXTENSION
IS NEEDED IN THE INTEREST OF JUSTICE.

RESPECTFULLY SUBMITTED,

BROWN KETH ALFORD A196744
BROWN KETH ALFORD A196744
ROSS CORRECTIONAL INSTITUTION
P.O. BOX 7010
CHILICOTHE, OHIO
45604

VERIFICATION!

I SWEAR UNDER PENALTY OF PERJURY
THE INFORMATION CONTAINED HEREIN
IS TRUE AND ACCURATE PURSUANT TO
28 U.S.C. 1746.

BROWN KETH ALFORD A196744
BROWN KETH ALFORD A196744

CERTIFICATE OF SERVICE

I CERTIFY A TRUE COPY OF THE FOREGOING DOCUMENT
WAS SENT VIA REGULAR U.S. MAIL POSTAGE PRE-PAID
THIS 22ND DAY OF MARCH, 2025 TO:

MARCY A. VONDERWELL (0078311)

ANDREW T. GATTI (0086854)

SENIOR ASSISTANT ATTORNEY GENERAL

CRIMINAL JUSTICE SECTION - CORRECTIONS LITIGATION UNIT

30 EAST BROAD STREET, 23RD FLOOR

COLUMBUS, OHIO (615) 432/5-3428

Emilio C. A196744
BRINN KETH ALFORD A196744
PLAINTIFF, PRO SE